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8 Attorneys for Defendant
9 **JOHN TRAVOLTA**

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

13 FABIAN ZANZI, an individual,
14 Plaintiff,
15 vs.
16 JOHN TRAVOLTA, an individual,
17 Defendant.

} CASE NO. CV 12-5393 SVW-AJW
HON. STEPHEN V. WILSON

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**DECLARATION OF JOHN
TRAVOLTA IN SUPPORT OF
DEFENDANT JOHN TRAVOLTA'S
MOTION FOR AN ORDER
REQUIRING PLAINTIFF TO FILE
AN UNDERTAKING TO SECURE
AN AWARD OF COSTS**

[Notice of Motion and Motion for
Undertaking; Memorandum of Points
and Authorities; and Declarations of
Lorena Alvarez, Michael Rasmussen,
Espen Been and Michael Weinstein In
Support Thereof Filed Concurrently
Herewith]

Complaint Filed: June 21, 2012

DECLARATION OF JOHN TRAVOLTA

I, John Travolta, declare:

3 1. I am making this declaration in support of my Motion for an Order
4 to Require Plaintiff Fabian Zanzi to File an Undertaking to Secure an Award of
5 Costs. The facts stated herein are true and correct and of my personal
6 knowledge, and if called and sworn as a witness, I could and would testify
7 competently thereto.

8 2. I have read Mr. Zanzi's Complaint against me in *Zanzi v. Travolta*,
9 United States District Court, Central District of California Case No. CV-12-
10 05293-SVW (AJWx). In particular, I have reviewed Mr. Zanzi's allegations in
11 Paragraphs 7-15 of the Complaint, in which Mr. Zanzi alleges a physical
12 encounter with me, as well as the allegations in Paragraphs 16-17 of the
13 Complaint, wherein Mr. Zanzi alleges that I offered him money to remain silent
14 regarding the alleged encounter.

15 3. While I was indeed a passenger aboard the MS Enchantment of the
16 Seas in or about June 2009, Mr. Zanzi's allegations in the Complaint are entirely
17 false, including, but not limited to, his allegations in Paragraphs 7-15 regarding a
18 purported physical encounter with me and his allegations in Paragraphs 16-17
19 regarding an alleged financial offer I made him. None of these events happened,
20 and Zanzi's allegations are pure fabrication.

22 I declare under penalty of perjury under the laws of the United States of
23 America and the State of California that the foregoing is true and correct.

Executed on August 7, 2012.

JOHN TRAVOLTA